

January 26, 2015

Hon. Jesse M. Furman
U.S. District Court
Southern District of New York
40 Foley Square
New York, NY 10007

VIA ECF

Re: USA v. Michael Lucarelli
Case No. 14 CR-00632 (JMF)

Dear Judge Furman:

We are attorneys of record for the defendant Michael Lucarelli who was sentenced by Your Honor on January 21, 2015.

The Court indicated at sentencing that defendant would be permitted to attend a truck driving school in Indiana if arrangements were made for acceptance and attendance. A letter from the Quality Driving School in Indianapolis, Indiana is attached.

In addition, defendant moves this Court to modify his bail conditions to amend the travel restrictions contained therein to include the Southern District of Indiana, along with the District of North Dakota and the Southern and Eastern Districts of New York, as acceptable travel locations until April 24, 2015, defendant's surrender date for service of sentence.

AUSA Brian Blais of the United States Attorney's Office, Southern District of New York has advised us that his office has no objection to the request.

Respectfully,



PATRICK W. MCGINLEY
LAURENT B. CHEVALIER

SO ORDERED:

U.S.D.J.